



U.S. Department of Justice

Civil Division  
Federal Programs Branch

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March 19, 2025

**Via ECF**

Hon. Christine P. O'Hearn, U.S.D.J.  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

**Re: *Ireland v. Hegseth, et al*, No. 25-cv-01918  
Consent Request for Leave to File Overlength Brief in Opposition to  
Plaintiffs' TRO**

Dear Judge O'Hearn

Defendants Secretary of Defense Pete Hegseth, Acting Secretary of the Air Force Gary Ashworth, and the United States Air Force hereby request leave from the page limit set by Local Civil Rule 7.2(d) for Defendants' forthcoming opposition to Plaintiffs' Motion for a Temporary Restraining Order. Defendants seek to increase the page limit from 30 pages to 40 pages in a 12-point proportional font. There is good cause for this request. Plaintiffs have filed a 40-page brief in a proportional font. To adequately respond to that brief, Defendants anticipate needing a proportionate extension of the page limitation. Defendants further believe that the extension will assist the Court in deciding the TRO motion. Defendants' counsel have conferred with Plaintiffs' counsel, who indicated that they consent to this request.

Should this proposal be acceptable to Your Honor, we respectfully request that you "so order" this letter and have the Clerk's Office file it on the docket. Thank you very much for your consideration of this request.

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

ALEXANDER K. HAAS  
Director, Federal Programs Branch

JEAN LIN  
Special Litigation Counsel

By: /s/ Elizabeth B. Layendecker  
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cc: All counsel of record (via ECF)

**SO ORDERED this 19<sup>th</sup> day**  
**of March 20<sup>25</sup>**

*Christine D. O'Hearn*  
**United States District Judge**